



April 16, 1999

U.S. Environmental Protection Agency
2890 Woodbridge Avenue
Bldg. 209 (MS-211)
Edison, New Jersey 08837
Attention: Cornell-Dubilier Electronics Site On-Scene Coordinator

Chief, New Jersey Superfund Branch
Office of Regional Counsel
United States Environmental Protection Agency
290 Broadway, 17th Floor
New York, New York 10007-1866
Attention: Cornell-Dubilier Electronics Site Attorney

Re: Cornell-Dubilier Electronics Site - Administrative Order on Consent for Removal
Action, Index No. II-CERCLA-99-2006
Progress Report No. 3

Dear Sirs:

As specified in Paragraph 50 of the above-referenced Administrative Order, on behalf of Respondent Cornell Dubilier Electronics, Inc. (CDE) and Dana Corporation (Dana), ENVIRON Corporation (ENVIRON) is submitting this progress report which summarizes activities conducted pursuant to this AOC between March 25, 1999 and April 7, 1999.

Completed Activities

During this period, the following activities were completed:

- Notification of selected surveyor and landscape architect. Notification was submitted to USEPA (via e-mail) on March 29, 1999.
- Completion of the *Residential Property Removal Action Work Plan for Tier II Residential Properties, South Plainfield, New Jersey* (Work Plan). The Work Plan was submitted to USEPA on April 1, 1999.
- Completion of a schedule for activities required by the AOC. The schedule was included in the Work Plan submitted to USEPA on April 1, 1999.

- Completion of the access agreements with each of the seven residential property owners (see AOC Paragraphs 36(a) and 60). Copies of the executed access agreements were included in the Work Plan submitted USEPA on April 1, 1999.
- Identification of disposal facilities for excavated PCB-containing soils (see AOC Paragraphs 37b, 40 and 67). Proposed facilities were identified in the Work Plan submitted to USEPA on April 1, 1999.
- Notification of the seven residential property owners regarding implementation of verification sampling and survey activities. Owners were notified on March 29 and 30, 1999.
- Completion of verification sampling on the seven properties in accordance with the *Sampling and Analysis Plan for Tier II Residential Properties, South Plainfield, New Jersey* (SAP), as conditionally approved by USEPA on March 30, 1999; sampling activities were completed on April 1, 1999.
- Completion of response to USEPA comments on the SAP in accordance with the conditional approval granted on March 30, 1999. Clarification of statistical analysis results and revised SAP pages were provided to USEPA on April 1, 1999.
- Collection of a composite soil sample for waste disposal characterization purposes. Collection of the composite sample was completed on April 1, 1999.
- Laboratory analysis of verification samples collected during the week of March 29, 1999.

Ongoing Activities

During this period, the following activities were initiated and/or are in-progress:

- Identification of prospective contractors, including remediation contractors and landscape contractors.
- Surveying on the seven residential properties of property boundaries and existing landscaping that may be impacted by removal action activities; survey activities were initiated during the week of March 29, 1999.
- Review of unvalidated verification sampling results and implementation of statistical data assessment procedures as described in the SAP.

Two-Week Schedule of Planned Activities

During the next two-week period (April 8, 1999 through April 21, 1999) the following activities are planned:

- Identification of prospective contractors, including remediation contractors and landscape contractors.
- Complete statistical assessment of preliminary verification sampling results for the seven Tier II properties.
- Preparation of property survey drawings, detailed excavation plans and restoration plans.


One-Month Schedule of Planned Field Activities

During the next four-week period (April 8, 1999 through May 5, 1999), the following field activities are planned:

- Completion of surveying on the seven residential properties of property boundaries and existing landscaping that may be impacted by removal action activities.

Please call me or Mark Nielsen at (609) 452-9000 if you should have any questions regarding this progress report.

Sincerely,


Michael P. Scott
Principal

MPS:jmn

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cc: R. Sanoff, Esq.
M. Last, Esq.

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Conv. w/ Mark Nielsen
regarding T2 work plan.

- 1.) Informed MN that if they intend to continue to use industrial park property for stockpile / loadout that it should be addressed in work plan.